

## United States District Court

United States Courts Southern

District of Texas

FILED

SOUTHERN

DISTRICT OF

TEXAS

McALLEN DIVISION

July 30, 2021

UNITED STATES OF AMERICA

V.

Nathan Ochsner, Clerk of Court  
**CRIMINAL COMPLAINT**

Gerardo Echavarria-Ledezma

Principal

Case Number:

YOB: 1982

Mexico

**M-21-1646-M**

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about 7/29/2021 in Hidalgo County, in the Southern District of Texas defendants(s) did,  
(Track Statutory Language of Offense)

knowing or in reckless disregard of the fact that Brayan Yohalma Jimenez-Giron, a citizen and national of El Salvador, and Bernardo Antonio, a citizen and national of El Salvador, along with two (2) other undocumented aliens, for a total of four (4), who had entered the United States in violation of law, concealed, harbored or shielded from detection or attempt to conceal, harbor, or shield from detection such aliens in any place, including any building or means of transportation, to wit; a residence in Weslaco, Texas,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(iii) FELONY

I further state that I am a(n) U.S. Border Patrol Agent and that this complaint is based on the following facts:

On December 15, 2020 and February 5, 2021, Border Patrol Agents received information from illegal aliens (IAs), in Border Patrol custody, regarding a residence being used to harbor IAs in Weslaco, Texas.

On July 29, 2021, Agents observed a male in a black Dodge pickup truck exit the property and drive to another residence to pick up another male subject. Donna Police Officers, who were contacted to assist with the investigation, initiated a vehicle stop for an expired license plate. Agents arrived on scene and questioned the driver, identified as Gerardo Echavarria-Ledezma, about his involvement with alien smuggling. Echavarria admitted that there was one (1) El Salvadorian citizen at his residence. After being read his Miranda Rights and agreeing to speak with Agents without the presence of an attorney, Echavarria freely admitted to being a citizen and national of Mexico illegally present in the United States. Echavarria admitted to renting his residence and gave Agents verbal and written consent, as well as the gate lock code to search his residence.

**SEE ATTACHED**

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

Complaint authorized by AUSA Matthew Phelps

Submitted by reliable electronic means, sworn to and attested  
telephonically per Fed. R. Cr. P. 4.1, and probable cause found on:

/S/ Shakira Singho

Signature of Complainant

Shakira Singho Border Patrol Agent

Printed Name of Complainant

7/30/2021 at 4:55 p.m.

Date

at McAllen, Texas

City and State

J. Scott Hacker, U. S. Magistrate Judge

Name and Title of Judicial Officer

Signature of Judicial Officer

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
McALLEN, TEXAS**

**ATTACHMENT TO CRIMINAL COMPLAINT:**

**M-21-1646-M**

**RE: Gerardo Echavarria-Ledezma**

**CONTINUATION:**

Agents interviewed the passenger, who was determined to be legally present in the United States.

When Agents and Hidalgo County Sherrieff Deputies arrived at Echavarria's residence in Weslaco, TX, they located four (4) subjects who were determined to be illegally present in the United States. Echavarria and the four (4) IAs, were placed under arrest and transported to the Weslaco Border Patrol Station for processing.

**PRINCIPAL STATEMENT:**

Gerardo Echavarria-Ledezma, a citizen and national of Mexico, was advised of his Miranda Rights, stated he understood his Rights, and agreed to provide a statement.

Echavarria stated he began renting his residence for \$1,200 per month shortly after illegally crossing into the United States on March 15, 2018. Echavarria claimed that a childhood friend asked him if he could house four (4) relatives. Echavarria admitted he would occasionally offer the subjects food, buy groceries, and take them grocery shopping. He said they would use their own money or money sent by family members.

**MATERIAL WITNESS STATEMENT 1:**

Bernardo Antonio Perez-Castillo, a citizen and national of El Salvador, was advised of his Miranda Rights, stated he understood his Rights, and agreed to provide a statement.

Perez stated that his friend made arrangements for him to be smuggled into the United States and paid approximately \$8,000 to \$9,000. Perez stated that after crossing the river with ten (10) other people, he was transported to the house where he was later encountered. He stated there were two (2) people at the house when he arrived. Perez claimed to have been harbored at the house for approximately one (1) month. He said that a female would provide them food.

Perez was unable to identify Gerardo Echavarria-Ledezma, through a photo lineup, as the owner of the residence.

**MATERIAL WITNESS STATEMENT 2:**

Brayan Jimenez-Giron, a citizen and national of El Salvador, was advised of his Miranda Rights, stated he understood his Rights, and agreed to provide a statement.

Jimenez admitted that his father-in-law made arrangements to be smuggled into the United States and paid \$2,500. Jimenez stated that after crossing the Rio Grande River into the United States, he was eventually transported to the house where he was encountered. He stated there were three (3) people at the house when he first arrived. Jimenez claimed he had been harbored at the house for approximately twenty (20) days and that a female subject would provide them food three (3) times per day. Jimenez stated that he met the owner of the house once when he was invited outside (by him) for a barbeque.

Jimenez identified Gerardo Echavarria-Ledezma, through a photo lineup, as the owner that invited him outside to eat.